

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**UNITED STATES OF
AMERICA,**

Plaintiff,

vs.

**MICHAEL WAYNE
WILLIAMS,**

Defendant.

CASE NO. 2:23-cr-00197

JUDGE GRAHAM

NOTICE CORRECTING FACTUAL MISSTATEMENT AT HEARING

Defendant Michael Wayne Williams hereby notifies the court that during the hearing that took place in this case on Wednesday, October 18, before Magistrate Judge King, a factual representation was made to the Court that all of the positions in the hedge fund run by Mr. Williams had been closed and were in cash, meaning that no investor money was exposed to market risk. Counsel for the Government made that representation to the Court based on his having been told that it was true by the undersigned.

Unbeknownst to the undersigned, and due to a miscommunication with his client, there was, in fact, an open trading position in the hedge fund at the time of the hearing. That position has since been closed, and there is currently no investor money at risk in the hedge fund. Mr. Williams intends to redeem all investors in

the hedge fund at the end of October, and he will not put any hedge fund investor money at risk between now and then.

The undersigned contacted counsel for the Government on Friday, October 20, shortly after learning of the mistaken representation to the Court, in order to correct the record. It is my understanding that the Government does not currently intend to seek any additional terms of release in response to this corrected information, but regardless, the parties both agree that it is important to correct the record with the Court.

This 23rd Day of October, 2023.

/s/Joshua A. Mayes

Joshua A. Mayes

Ga. Bar No. 143107 (*pro hac vice*)

Robbins Alloy Belinfante Littlefield, LLC

500 14th St. NW, Atlanta, GA 30318

Attorney for Michael Wayne Williams

CERTIFICATE OF SERVICE

This is to certify that on October 23, 2023, a true and correct copy of the foregoing was served electronically on counsel for the Government through the Court's CM/ECF system.

/s/Joshua A. Mayes